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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON
 REED, an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual
 and citizen of Canada; THOMAS

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND
 ORDER TO EXTEND DEADLINE TO
 RESPOND TO SGB'S MOTION TO
 DISMISS [ECF #204]**

[Second Request]

PARENTEAU, an individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter, Goldmark & Bender, P.S. (“SGB”), hereby stipulate to extend Plaintiff’s deadline to file a response to SGB’s Special Motion to Dismiss Pursuant to NRS 41.660 [ECF #204]¹ (the “Motion”), currently set for May 29, 2020, until June 5, 2020, and as grounds state as follows:

1. On May 1, 2020, SGB filed the subject Motion.
2. Since SGB filed the Motion, both Plaintiff and SGB have been required to respond to voluminous discovery requests and respond to various motions filed in this case. *See*, e.g., Plaintiff’s Responses to SGB’s Motion for Protective Order, [ECF #216], and Reed Hein’s Motion to Compel [ECF #214], and SGB’s response to Diamond’s Motion to Exceed the Deposition Limit [ECF #215], all filed on May 8, 2020. Additionally, Diamond has responded to the Defendants’ oppositions to Diamond’s Motion to Exceed the Deposition Limit.
3. Since SGB filed, Plaintiff has been diligently working to respond to the Motion, and Diamond’s response is well underway.
4. While Plaintiff has been working diligently, a personal issue has arisen that prevents Plaintiff from being able to file a response to SGB’s Motion prior to the current deadline of May 29, 2020.
5. As a result, Plaintiff and SGB have agreed to extend Plaintiff’s response deadline

¹ The Motion was originally filed as ECF #202, but a corrected image was filed as ECF #204.

1 by one (1) week, until June 5, 2020.

2 6. This stipulation is not made for purposes of delay.

3 Dated this 28th day of May, 2020

4 GREENSPOON MARDER, LLP

LIPSON NEILSON, P.C.

5
6 /s/ Phillip A. Silvestri, Esq.

/s/ Megan H. Hummel, Esq.

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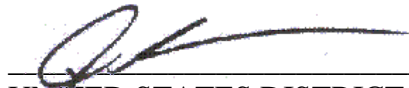
12 Diamond Resorts Corporation

Las Vegas, NV 89144-7052

13 Attorneys for Defendant

14 Schroeter, Goldmark & Bender, P.S

15 IT IS SO ORDERED

16 

17 UNITED STATES DISTRICT JUDGE

18 DATED: 5/28/2020

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